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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Amendment of Part 90 of the)
Commission's Rules to)
Expand Coordination of the)
800 MHz General Category)
Channels)

PR Docket No. 92-209

RM - 7965

To: The Commission

REPLY COMMENTS OF FLEET CALL, INC.

FLEET CALL, INC.

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December 10, 1992

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REPLY COMMENTS OF FLEET CALL, INC.

I. INTRODUCTION

Fleet Call, Inc. ("Fleet Call"), pursuant to Section 1.415 of the Commission's Rules, hereby respectfully files the following Reply Comments in the above-captioned proceeding.^{1/} The proposal is intended to increase the frequency coordination options available to applicants for conventional SMR systems using General Category channels.

Fleet Call is one of the largest licensees and operators of Specialized Mobile Radio ("SMR") systems in the United States. It provides dispatch, interconnected and ancillary mobile communications services to approximately 140,000 end users on both 800 MHz and 900 MHz SMR systems.

In response to the increasing demand for advanced, high-quality mobile communications, Fleet Call is constructing Enhanced Specialized Mobile Radio ("ESMR") systems in Chicago, Dallas,

^{1/} Notice of Proposed Rulemaking, FCC 92-430, released October 6, 1992 (the "Notice").

Houston, Los Angeles, New York and San Francisco.^{2/} These ESMR systems will combine state-of-the art digital multiplexing technology with a low power multiple base station configuration to increase by more than 15 times the capacity of Fleet Call's existing SMR systems in each market. The first ESMR system will be operational in Los Angeles in mid-1993, followed by San Francisco in 1994.

Accordingly, Fleet Call has an interest in the Commission's proposal to give applicants for conventional SMR systems licensed on General Category frequencies the option of seeking frequency coordination from any one of the three recognized 800 MHz frequency coordinators.^{3/} Fleet Call supports the Commission's proposal, as discussed below.

II. BACKGROUND

Under existing Commission policy, applicants for conventional SMR systems must obtain frequency coordination from NABER.^{4/} Applicants wishing to add conventional General Category channels to existing trunked systems or to create trunked SMR

^{2/} See In re Request of Fleet Call, Inc. for Waiver and Other Relief to Permit Creation of Enhanced Specialized Mobile Radio Systems in Six Markets, 6 FCC Rcd 1533 (1991), *recon. den.* 6 FCC Rcd 6989 (1991).

^{3/} These are the National Association of Business and Educational Radio, Inc. ("NABER"), the Industrial Telecommunications Association, Inc. ("ITA" -- formerly the Special Industrial Radio Service Association, Inc. or "SIRSA") and the Associated Public Safety Communications Officers ("APCO").

^{4/} In the Matter of Trunking in the Private Land Mobile Radio Service for More Effective and Efficient Use of the Spectrum, 5 FCC Rcd 4016 (1990) at para 57 and n. 75.

systems by consolidating conventional systems may seek coordination from any one of the three recognized coordinators.^{5/} In the Notice, the Commission states that each of the three coordinators maintain up-to-date data bases for General Category channels and are capable of coordinating applications for conventional SMR systems.^{6/} It states that applicants requesting General Category channels may be at a competitive disadvantage vis-a-vis applicants seeking these same channels for trunked SMR systems because the former cannot select the coordination service that best meets their requirements. Finding no apparent justification for limiting the coordination options of applicants for conventional as opposed to trunked SMR systems, the Commission proposes permitting applicants for conventional SMR systems on General Category channels to use any of the three 800 MHz coordinators.

III. DISCUSSION

Fleet Call believes that providing conventional SMR applicants with additional frequency coordination options is in the public interest. Fleet Call concurs in the comments of the Council of Independent Communication Suppliers ("CICS") supporting the proposal. CICS notes that workload, staff resources and other factors contribute to fluctuations in coordination processing speed among the three coordinators. It notes also that applicants develop useful rapport with certain coordinators and desire to work with them on a consistent basis. CICS asserts that applicants

^{5/} Id. at para 56.

^{6/} Notice at para. 4.

should be able to choose the coordinator best poised to provide them with timely services.

Fleet Call agrees. There is no benefit to limiting conventional SMR applicants to a single frequency coordinator. Each of the three recognized 800 MHz coordinators is equally capable of coordinating conventional General Category systems. Each of them already coordinates applications to form trunked systems using General Category channels. The Commission has concluded -- and the comments confirm -- that there are no practical nor public interest reasons for limiting applicants for conventional SMR systems to one frequency coordinator. Moreover, allowing a choice of coordinators will stimulate competition to provide expeditious and reliable coordination services, thereby benefitting all applicants requiring frequency coordination.^{7/}


^{7/} NABER conditions its support of the Notice on expanding the rulemaking to permit any of the three coordinators to coordinate any application seeking authorization for a conventional system using General Category channels -- not just applications for conventional SMR systems. This proposal, however, is outside the scope of this proceeding.

IV. CONCLUSION

For these reasons, the Commission should amend Section 90.615 of its Rules as proposed in the Notice.

Respectfully submitted,

FLEET CALL, INC.

By, 
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Dated: December 10, 1992

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Reply Comments of Fleet Call, Inc. has been mailed by United States first class mail, postage prepaid, this 10th day of December, 1992, to the following:

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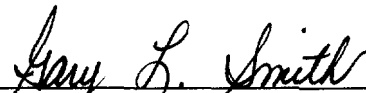
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